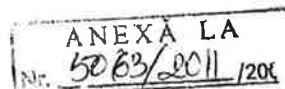


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# **EXHIBIT B**



**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
Civil Division**

**NORMAN WILLIAMS** ~~XXXXXXXXXX~~

Individually, and as legal representative of

\*\*\*\*\*,

**LEGAL REPRESENTATIVE of**

\*\*\*\*\*,

**LEGAL REPRESENTATIVE of**

\*\*\*\*\*,

**Plaintiffs,**

**C.A. No: 2349-11**

**J. Edelman**

**V.**

**[FEG,]**

**and**

**DOES COMPANY DISTRIBUTOR,**

**Substitute New Defendant:**

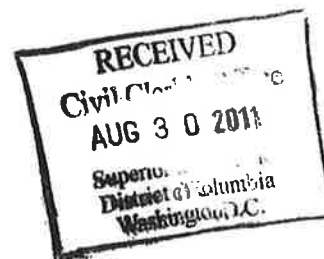
**ROMARM**

**Att: Vasile Marius CRISAN**

**5B, Timisoara Str.**

**Bucharist, Romania 061301**

**Defendant.**



~~PLAINT~~ AMENDED COMPLAINT

Plaintiffs are vacating former plaintiff, Nardyne Jefferies, acting individually and as legal representative of \*\*\*\*\* from the lawsuit. They are further substituting ROMARM for FEG as one of the defendants as shown in the style of the case. No service overseas has been executed and no answer has been filed in this case.

Respectfully submitted,

Daniel Wemhoff, Esq. #420233  
4600 S. Four Mile run Dr. #831  
Arlington, VA 22204  
(703) 589-2199

Certificate of Service



**COMPLAINT**

1. This action is brought against the Defendant manufacturer, assembler and distributor of the AK-47 of ~~ROMANIAN~~ <sup>ROMANIAN</sup> origin whose weapon ultimately caused the deaths of plaintiffs, on behalf of which this action is taken, either named, or yet to be named, in their individual, or legal capacity, for the deaths of ~~Jordan [redacted]~~

~~[redacted]~~ and ~~[redacted]~~ <sup>ROMANIAN</sup> (ROMARM)  
2. The above identified ~~[redacted]~~ made, or assembled AK-47, was the direct and proximate cause of the deaths on behalf of those named or yet to be named in this lawsuit which occurred on or about late March 2010 in Washington, D.C.;

3. Plaintiffs bring this action to recover compensatory and punitive damages under the Wrongful Death Act and Survival Act in the District of Columbia. D.C. Code Sec. 16-2701; D.C. Code Sec. 12-101;

4. Specifically, plaintiffs cite to the District of Columbia Assault Weapons Manufacturing Strict Liability Act of 1990, D.C. Code Secs. 7-2551.01(1)(A) and 7-2551.02 (SLA);

5. Under these Sections of the DC code, liability arises without regard to fault of proof of defect if bodily injury or death proximately results from the discharge of an assault weapon used in the District of Columbia;

6. Plaintiffs were either innocent bystanders, or potential witnesses of crimes, murdered by the use of the ~~[redacted]~~ <sup>ROMARM</sup> AK-47 weapon recovered in their deaths;

7. Criminal Complaints filed in the deaths of the representative plaintiffs on March 31, 2010, by the Office of the *United States Attorney v. Orlando Carter and Nathaniel Simms*, identified the Defendant, ~~[redacted]~~ <sup>ROMARM</sup> made AK-47, as the

weapon responsible for the deaths of those who represent them in their legal capacity;

8. Further, criminal actions filed under DCTN: USP101622, on the same date, charge Orlando Carter with use of the assault weapon identified in this action with the deaths of those killed represented individually or in their legal capacity;

9. Defendants' weapon was recovered in the identified crimes and is believed to be presently held as evidence by the Metropolitan Police Department of the District of Columbia and is being further examined through DC-FOIA or BATFE – FOIA filings currently underway;

10. Plaintiffs further allege that the presence of defendants' AK-47 weapon found in the District of Columbia establishes a public nuisance due to the fact it is a dangerous assault weapon designed to maim or kill in the hands of the criminal element;

11. Plaintiffs further allege that the defendants have acted in gross negligence by allowing its dangerous weapons to circulate in the District of Columbia where such assault weapons are prohibited and cannot be licensed;

12. Defendants, further, have undertaken no curative steps to require its dealers and/or representatives to sell or distribute their weapons in a legal manner and instead have allowed their weapons to be negligently distributed with the foreseeable risk that their weapons will fall into the hands of the criminal element and endanger those like the children killed by their weapon who are legally represented by the plaintiffs in their individual and representative capacities.

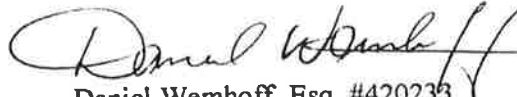


Daniel Wernhoff, Esq. #420233  
4600 S. Four Mile Run Dr. #831  
Arlington, VA 22204  
(703) 589-2199

REFER TO NEXT PAGE

ANEXIA  
NOV 10 2014

WHEREFORE plaintiffs seek damages under both Wrongful Death and Survival Acts in the amount of Five Million Dollars (\$5Million) each for the four (4) plaintiffs in this action.



Daniel Wernhoff, Esq. #420233  
4600 S. Four mile run Dr. #831  
Arlington, VA 22204  
(703) 589-2199



Superior Court of the District of Columbia  
CIVIL DIVISION

500 Indiana Avenue, N.W., Suite 5000  
Washington, D.C. 20001 Telephone: (202) 879-1133

NORMAN WILLIAMS v DIANE HOWE

Plaintiff

ANEXA LA  
Nr. 5063/2011 /201

vs.

Case Number C.A. No. 2349-1

ROMARK

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty (20) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the party plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within five (5) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

DANIEL WEMHOFF  
Name of Plaintiff's Attorney  
4600 S. FOUR MILE RUN DR  
Address ARLINGTON, VA #831  
22204  
Telephone 703-589-2199

By

Date

Clerk of the Court

Deputy Clerk

如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828 로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-682-2700) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation  
Vea al dorso la traducción al español